# UNITED STATES DISTRICT COURT DISTRICT OF MAINE

UNITED STATES OF AMERICA

v.

No. 1:21-cr-00193-LEW

TRAVIS BESSEY

#### GOVERNMENT'S SENTENCING MEMORANDUM

The United States of America respectfully submits this memorandum to assist the Court in sentencing. The government notes the Revised PSR in this case is robust and need not be set forth again in this pleading. The defendant's guidelines range is life. See Revised PSR at ¶89. However, the defendant's statutory maximum is 60 years. Id. at ¶88. For the reasons stated below, the facts of this case make a sentence of 60 years, followed by lifetime supervised release, fully appropriate.

#### **ARGUMENT**

- 1. The 3553(a) factors favor a 60-year sentence.
  - a. History and characteristics of the defendant.

The defendant clearly had a troubled upbringing. <u>See</u> Revised PSR at ¶¶ 72-73. There is nothing in the record, however, that would explain the defendant's conduct in this case.

## b. Facts and circumstances of the present offense.

In order to protect the privacy of the victims in this case, the government will not detail the facts that are effectively described in the Revised PSR. See Revised PSR at ¶¶ 5-28. In addition to the horrifying facts underlying the convictions in Counts 1 and 2 of the indictment, however, the government would like to point out several other

disturbing facts. First, the defendant had no age limits with respect to the children he wanted to see being abused. For example, in a Kik exchange, the defendant was asked, "Baby rape is okay?" He responded: "Yes as young as born yesterday is 100 okay no matter what anyone says." Id. at \$\mathbb{1} 26(f)(emphasis in original)\$. Second, and relatedly, the defendant sought out the cruelest images and videos he could find. He requested "images and videos involving 'girls age 1-7 rape creampie force abuse and gore;' 'Got any like xxx force kinda stuff with baby';' 'Then send me rape/creampie girls no older than 2;..." Id. at \$\mathbb{1} 27\$. Third, the defendant was actively involved in an online community of like-minded pedophiles. See id. at \$\mathbb{1} 17-18\$. He was not simply downloading images and videos from the internet. Finally, and relatedly, the defendant was sharing images and videos of his self-produced child sexual abuse material with this online community. See, e.g., at \$\mathbb{1} 26(b)\$.

## c. Seriousness of the offense and adequate deterrence.

This case involves the sexual exploitation of children, including a child only one year old. A significant sentence is needed to afford just punishment and promote respect for the law.

# d. Protection of the public.

Children are in danger so long as Mr. Bessey is at large. A lengthy sentence is required to protect the public from Mr. Bessey.

#### e. Rehabilitation needs.

Mr. Bessey has proven that his rehabilitative needs are vast, and correction of his behavior will take significant time and resources. A sixty-year sentence would afford Mr. Bessey adequate time to choose a better path and act upon that choice. An ensuing life term of supervised release would help ensure Mr. Bessey remains on the correct

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path.

## 2. Restitution

As described in Paragraph 31 of the Revised PSR, the defendant's child pornography collection involved victims from 186 different series. Many of the known victims from those series submitted restitution requests to the court. The government has spoken to counsel for all of the victims who submitted restitution requests. These victims have agreed to withdraw their restitution requests. In turn, the defendant has agreed to pay \$20,000 in restitution to Victim 1 and \$20,000 in restitution to Victim 2.

## **CONCLUSION**

For the above-described reasons, the Court should enter a judgement of 60 years imprisonment, followed by lifetime supervised release. In addition, the court should order restitution in the amount of \$20,000 each for Victim 1 and Victim 2.

Respectfully submitted,

Date: May 22, 2025

CRAIG M. WOLFF ACTING UNITED STATES ATTORNEY

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# **CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2025, I electronically filed the Government's Sentencing Memorandum with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Ronald Bourget, Esq.

**United States Attorney** 

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